

Final

Memphis Depot

BRAC Cleanup Team

Meeting Minutes

19 January 2006

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Project Team	Organization	Phone
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BCT Business/Previous Meeting Minute Approval

The BCT approved and signed the 15 December 2005 meeting minutes.

Dunn Field Source Areas Remedial Design (RD)

Mr. Nelson reported that the Source Area Remedial Design Investigation (RDI) Technical Memorandum (TM) was on schedule to be submitted for internal review by 31 January 2006. It would then be distributed for BCT review. Mr. Nelson presented cost and effectiveness evaluations for proposed soil remedy enhancements to treat the loess and the fluvial deposits. The evaluation included using thermal in situ thermal desorption (ISTD) to treat the loess all the way down to groundwater.

Mr. Ballard questioned why CH2M Hill had selected thermal ISTD instead of electrical resistive heating (ERH). Mr. Perlmutter explained that CH2M Hill's experience indicated that ISTD was a more thorough technology and would achieve better contaminant reduction than ERH. He indicated that the costs for ISTD and ERH were similar, but that the end results of ISTD were better than ERH.

Mr. Perlmutter continued that the estimated ISTD heating time was 167 days to achieve 99.9% reduction of contaminant levels. To achieve 99.99% reduction, the cost would increase about 15%. Achieving the 1,1,2,2-Tetrachloroethane (PCA) and Trichloroethene (TCE) remedial goals (RGs) would require 99.9994% reduction. He said that the ISTD system was fairly self-sufficient, so the increased costs would mostly be for energy.

Mr. Perlmutter presented information regarding the fluvial soil vapor extraction (SVE) treatment time. The estimated mass removal rate was 0.5 lb/day for 1,1,2,2-PCA and 1.4 lb/day for TCE. Considering some performance factors, CH2M Hill concluded that the actual treatment time for the maximum concentrations using SVE only in the fluvial would be less than 5 years. Therefore, it was logical to use SVE without enhancements to cleanup the fluvial deposits. Mr. Nelson interjected that the fluvial was mostly sand with some clay stringers and started at about 40 feet below ground surface. From the data gathered from installation of monitoring wells, there was a definite delineation between the loess and fluvial deposits.

Mr. Holmes asked if there was any reason to think that thermal ISTD was better than zero-valent iron (ZVI) to treat the groundwater. Mr. Perlmutter responded that thermal ISTD would remove a lot of contamination, but he questioned the need to reduce levels in groundwater to non-detect levels under the source areas with the permeable reactive barrier (PRB) down gradient. Mr. Ballard said that the Dunn Field Record of Decision (ROD) specified meeting the Safe Drinking Water Act maximum contaminant levels (MCLs), but that it did not specifically indicate treating the groundwater under the source areas to MCLs. So, the team should determine the groundwater levels that the source areas treatment should achieve. Mr. Holmes said that the treatment must bring levels down sufficiently; so that the PRB would reduce the levels to the MCLs. Mr. Perlmutter indicated that thermal ISTD would not reduce the source areas soils maximum concentrations down to the soil screening levels (SSLs).

Mr. Nelson then presented information regarding the process the team followed to calculate the site-specific Dunn Field fluvial aquifer dilution attenuation factor (DAF) for contaminant levels above the default or generic SSLs. The process utilized the Jury and EMSOFT models and began with the MCLs for the fluvial aquifer then back calculated what the SSLs must be in order to meet the MCLs.

Mr. Nelson commented that the assumptions were based upon data collected at the Main Installation (MI), which was not complete and did not necessarily represent Dunn Field

hydrogeological conditions. Since then, the Dunn Field conceptual site model and the technology to define SSLs had changed.

Mr. Nelson reported that CH2M Hill planned to include a discussion of SSLs revision in the intermediate Source Areas RD. Mr. Ballard indicated that he would rather not see the revision to SSLs in the RD because EPA comments may prompt the team to gather more data to evaluate SSLs. He did not want to delay the RD in order to reevaluate something that, from a regulator point of view, was resolved. He continued that the team was going to implement a remedy to clean up the source areas, and that it was just a question of how long the remedy would operate.

Mr. Ballard said that the team could reevaluate SSLs during construction or in the early days of operation. Mr. Buxbaum interjected that if the RD included the original SSLs as well as revised SSLs, not as remediation levels just as information, the team could use those numbers as a benchmark to compare against the original RGs during the remedial system performance review. Mr. Ballard reiterated that he wanted the RD to reflect what was in the ROD and that he did not want potentially conflicting information in the RD. He suggested preparing a TM to be included in the site files that could then be used as the administrative record for any potential ROD amendment in the future.

Mr. Holmes commented that the team was going to implement the source areas remedy. But the current data indicated that the remedy would not meet all of the RGs, although it may meet the remedial action objectives (RAOs). Mr. Spann suggested that it may be appropriate to include the SSL revision information in the remedy limitations portion of the RD for use in the 5-Year Review. And he reiterated that it was a good idea to have a TM for use in the administrative record to support a potential ROD amendment. Mr. Ballard stated that the team needed to move forward with the RD and that the decision to change the SSL would not be necessary until later in the cleanup process.

Mr. Holmes indicated that the team would like reassurance that they had support from the regulators that these RGs may not be achievable based on recent empirical data. Mr. Dobbs was concerned about spending taxpayer dollars on a remedy that was probably not going to succeed. Mr. Ballard said that there was a ROD that must be implemented and that the team should plan to meet the RGs in the ROD. He continued that the team could then, on a separate track, document why the RGs should change based on recent empirical data and move forward with a ROD amendment. He reiterated the need to implement the ROD, and then, if the remedy did not perform as expected, document that information and propose a ROD amendment at that point.

Mr. Nelson summed up the discussion by saying that CH2M Hill was working the RD. The team that worked on the original DAF calculations is different from the RD document team. CH2M Hill could work on a TM, and, if the TM was ready when the RD was ready, then CH2M Hill would include it in the RD. He confirmed that the RD and the RD cost evaluations were to meet the RGs stated in the ROD.

Property Transfer Status

Mr. Holmes distributed a spreadsheet showing the completed Findings of Suitability to Transfers (FOSTs) and the upcoming FOSTS as well as information regarding the final disposition of property.

Mr. Duck updated the team on the current status of property transfers. The deed process was completed for the MI Golf Course and 46.74 acres was transferred. The Dunn Field property to

be transferred for a park was assigned to the Department of Interior (DOI). But when DOI went to complete the deed to the City of Memphis, the City declined the property. DOI told the City all they had to do was mow it, but the City indicated they were not in a financial position to provide grounds maintenance. DOI reassigned the property to the Department of Defense/Department of Army (DA).

Mr. Duck said that next week the Mobile District Corps of Engineers intends to contact the City of Memphis Mayor to ensure the City does not want the no-cost property transfer. If the Mayor declines the property, the Mobile District Corps of Engineers would then contact other state/local agencies to determine their interest in the property and identify a federal agency that could transfer the title. If no interest is found, as is expected, the property will be put on the market for sale.

Mr. Duck reported that the Memphis Area Transit Authority (MATA) had indicated they would request special legislation through Congressman Harold Ford Jr. to allow a no-cost transfer of the Dunn Field property from the Army to the City, but that the process could take a year or more. He continued that the DA may decide not to wait and may put the property on the open market for public sale. Mr. Duck confirmed for Mr. Dobbs that DA would decide the final disposition of the FOST 4 property.

Mr. Wagoner interjected that the DA wanted to dispose of all legacy BRAC property as soon as possible, and that DA may want to move forward with a Finding of Suitability for Early Transfer (FOSET) on the remaining Dunn Field property. Mr. Buxbaum commented that an early transfer was not conducive for the Disposal Sites area given the scope of the remedial action. Mr. Wagoner and Mr. Buxbaum agreed to contact Mr. Tom Lederle of the DA BRAC Office to discuss the matter.

Mr. Duck said that he had not received official word from the DA that they were denying MATA's special legislation request, but the unassigned property would come up on the DA's radar as they reviewed legacy BRAC property.

Mr. Buxbaum explained that the DA BRAC Office was to be realigned. Therefore, the point of contact the team had worked with in the past may change, and there would be a lot more pressure to move the property. Mr. Ballard suggested that only the title of the responsible party should be used on future Land Use Control Implementation Plans (LUCIP).

Mr. Holmes reported that the next MI LUCIP annual site inspection was scheduled for July 2006, and the land use control verification was scheduled to be performed with the CERCLA 5-Year Review in 2007.

Mr. Nelson reported that he provided the draft Dunn Field LUCIP to Mr. Buxbaum, who provided comments. Mr. Nelson incorporated the comments and returned the revised LUCIP back to Mr. Buxbaum. Mr. Buxbaum reported that he needed to schedule the DA review before sending the draft LUCIP to EPA. He needed to ensure that the Shelby County drilling permit program was the only groundwater protection control for the off-site portion of the plume. Mr. Buxbaum may want to include something stronger to ensure no private drilling of groundwater wells in the affected area as there may be some debate between DA and EPA about the necessity of additional controls for the off-site plume. Mr. Ballard said he did not foresee EPA requiring more restrictions than were selected in the ROD. Mr. Buxbaum said that his experience at other

sites was that there had been a real push to increase controls on off-site groundwater contamination plumes.

Mr. Holmes provided the draft master schedule to Mr. Buxbaum and confirmed that the Dunn Field LUCIP was tied in with the Dunn Field Source Areas RD. Mr. Buxbaum indicated that the iteration worked with CH2M Hill was about 90% completed, but that CH2M Hill was still working the maps that showed the restricted areas including the off-site plume. The LUCIP is scheduled to be submitted to the BCT with the Source Areas 60% RD on 19 April 2006. Mr. Buxbaum noted this was ambitious but he would try to meet it.

AI: Mr. Duck to provide updated Dunn Field survey acreage to Mr. Holmes.

AI: Mr. Buxbaum and Mr. Wagoner to provide Mr. Dobbs (cc Mr. Holmes) the results of their conversation with DA regarding Dunn Field.

AI: Mr. Duck to provide Mr. Dobbs (cc Mr. Holmes) a copy of the letter going to the City of Memphis mayor regarding the Dunn Field FOST 4 parks property.

AI: Mr. Buxbaum to work with CH2M Hill to meet the submittal schedule for the Dunn Field LUCIP.

BRAC Cleanup Plan (BCP)/Master Schedule

Mr. Holmes distributed the draft master schedule dated 12 January 2006 to be included in the BCP Version 9 as well as selected dates that changed from the BRAC Cleanup Plan (BCP) Version 8. Mr. Spann asked if there was a chance that the MI remedial action (RA) start date would be delayed. Mr. Dobbs responded that AFCEE was still working the independent government estimate and then must award the contract. Mr. Holmes said he was still hopeful that the team would meet the April notice to proceed date.

Mr. Ballard voiced concern that submittal dates for primary documents and start dates for remedial actions were significantly later on the Version 9 draft master schedule than on the current (Version 8) master schedule. He stated that there were not significant unknown conditions at the Memphis Depot and no reason, per the Federal Facilities Agreement (FFA), for further delays. Mr. Ballard said that EPA would hold DDC to the Version 9 master schedule in accordance with the provisions in the FFA. He continued that internal contracting issues did not offer good cause, as defined by the FFA, for delays.

Mr. Dobbs asked the regulators what dates they needed for their milestone check lists. Mr. Ballard required the RA start date, the RA construction complete date, the RA Completion Report (RACR) submittal date, and the Preliminary Close Out Report submittal date. Mr. Spann indicated that Tennessee received credit in certain categories such as significant progress or completion. He continued that if a report was submitted or activities occurred, he would consider it progress and would receive credit for it.

Mr. Holmes reported that the project had slipped about a year, but that the team had made a lot of progress and had obtained a lot of valuable information from the Early Implementation of the Selected Remedy (EISR), the RDI and the new PRB construction technologies. He considered each of them successes for the project.

Mr. Holmes reported that MACTEC had distributed Section 6 and the draft master schedule from the Rev. 0 BCP Version 9 to EPA and TDEC via email. MACTEC planned to distribute the entire Rev. 0 BCP Version 9 at end of the week. Mr. Holmes indicated that the information

contained in Version 9 was representative of conditions as of 1 November 2005. He then reviewed the unresolved issues contained in Section 6.

Off-Depot Preliminary RD

Mr. Nelson provided a review of the 30% Off-Depot RD. He presented the basic information to be included in the preliminary RD such as selected remedies, remedial action objectives, groundwater remediation goals, and previous pre-design and design activities.

The basis of the design was groundwater sampling analytical results from August 2004, October 2004, and November 2005. The proposed remediation strategy included a zero-valent iron (ZVI) PRB and monitored natural attenuation (MNA) with the possibility of enhanced bioremediation treatment (EBT) using vegetable oil. Mr. Perlmutter presented and discussed a map indicating the proposed PRB location, the MNA zone, and the proposed sodium lactate injection points.

Mr. Ballard asked if there were access agreements in place with the property owners within the PRB area, as currently located. Mr. Nelson indicated that they may need access to the railroad property, which would be for a specific performance period, and that CH2M Hill would work that issue when they had more information about the location and performance period.

Mr. Perlmutter described the current design elements of the PRB including height, length, thickness and volume of ZVI to be injected. The MNA design elements would be based on groundwater modeling results and would include groundwater monitoring and a decision tree for the possible contingency of enhanced bioremediation. He then described elements of the possible EBT contingency. Mr. Ballard asked why CH2M Hill had selected vegetable oil instead of sodium lactate for the EBT contingency. Mr. Perlmutter said that CH2M Hill would evaluate using sodium lactate, but that CH2M Hill favored a longer-term EBT source, such as vegetable oil.

Mr. Nelson then presented the performance standards from the ROD. Dr. Ludwig asked if the groundwater contamination plume was stable or still moving. Mr. Nelson responded that one viewpoint was that the plume had been there for 50 years and that as the team installed more wells we found out that the plume was larger than previously thought. Another viewpoint was that the plume was moving. Dr. Ludwig said that if the plume was moving then the higher concentrations might impact the ability of the PRB to reduce concentrations. The team reviewed the top of clay map from the EISR IRACR focusing on the proposed PRB location and discussed contamination trends in monitoring wells running perpendicular to the PRB location.

Mr. Ballard said that in January 2005 the BCT discussed three scenarios regarding the PRB location. The April 2005 BCT minutes reflect that the team was evaluating the use of ZVI to treat contamination down gradient of the PRB. Now the team was discussing MNA for groundwater contamination between the PRB and the area just west of the railroad tracks. He saw the team slowly moving away from what the BCT agreed to in January and April.

Mr. Holmes said that the EISR findings indicated that it was not cost effective to inject ZVI in the area between the PRB and the railroad tracks. The EISR IRACR indicated that the area would be addressed in the Off-Depot RD, which will include modeling to identify the areas that would be effectively treated by MNA. He continued that it was not yet clear what MNA could effectively treat, especially if the plume was not moving past its current configuration. Mr. Ballard replied that the ROD placed the PRB along the railroad track because it would treat the high levels off-site at the MLGW area. He said that the BCT did not agree to leave the area

between the current RD PRB location and the railroad tracks untreated. He was not arguing the logic of moving the PRB location, but he reiterated that the contaminant mass that was already past the PRB location needed to be treated.

Mr. Holmes continued that the EBT contingency level needed to be defined, and that if levels in that area were already higher than the contingency level then the contingency would be implemented. Mr. Nelson reported that previous modeling showed that the concentrations at MLGW would be below MCLs if they moved into the intermediate aquifer. He said CH2M Hill needed to complete the RD model to see what might occur.

Mr. Spann voiced concern that levels were slowly rebounding at MW155 where ZVI was injected, so he was not convinced that the PRB would work as the team thought it would. Therefore, he did not think MNA was the solution to the down gradient contamination. Mr. Ballard re-iterated that the team had agreed to treat the groundwater contamination down gradient of the PRB. He pointed out that the figure identifying areas to implement the EBT contingency included only the MLGW area, and that he needed to see the area between the PRB and the railroad track included in the treatment area. He also commented that if the PRB were moved closer to the railroad tracks then that area would be eliminated. Mr. Miller pointed out that the saturated zone thickness increased closer to the railroad track and that it would increase the wall height necessary to treat the plume. In addition, the groundwater gradient decreases sharply near and west of the railroad tracks. The gradient may be too low in the vicinity of the railroad tracks to drive groundwater through the wall if the PRB installation causes any decrease in the hydraulic conductivity of the aquifer materials surrounding the wall.

Mr. Nelson reported that CH2M Hill had received funding for the second phase of groundwater modeling. He said that the first phase of modeling assumed that only 100 ppb remained after the implementing the remedy. Mr. Ballard said the modeling must answer the question of how long it would take MNA to treat groundwater contamination not actively remediated.

Mr. Nelson indicated that the second modeling phase would look at the current concentrations down gradient and outside of the proposed PRB location. Mr. Ballard said he needed to be convinced that the area between the PRB and the railroad tracks did not need to be treated. Mr. Holmes said that the team would look at the entire area down gradient of the PRB, but that the first step they took was to address the EISR area. Mr. Nelson said that the EBT contingency points in the MLGW area were to address concerns about being able to access the area to treat it. He ended the discussion by saying that CH2M Hill had not intended to disregard the area between the PRB and the railroad tracks.

Mr. Nelson continued reviewing the 30% RD by describing various elements of the long term monitoring (LTM) plan. The LTM plan would include sampling approximately 142 monitoring wells on and off Dunn Field and would define the monitoring well groups such as background, sentinel, and compliance/performance.

Mr. Perlmutter presented information from the ZVI PRB Implementation Study work plan. He reported that field work was scheduled to begin in April 2006 and would continue for about 10 days with groundwater sampling continuing until October 2006. The pilot study would occur on property owned by Shelby County, but within the MLGW right-of-way.

Mr. Endo and Mr. Terry from Hayward Baker, Inc. (HBI), described the process to construct the 50-foot long, 8-foot tall PRB during the pilot study. HBI evaluated past projects in order to

increase the quality of the wall and to decrease the waste ZVI produced. Mr. Endo indicated that HBI would cut the geometry with air and guar slurry and then tremie fill the geometry with a pre-mixed combination of ZVI and sand to displace the soil/guar slurry.

HBI felt this would reduce the overall costs by reducing the iron waste produced. Mr. Terry said that using the air and guar slurry to cut the geometry and then filling the space with the ZVI/sand mixture alleviates the concern of reducing the aquifer porosity. Mr. Endo indicated that constructing the PRB was a variant of what HBI has done in the past. He said that HBI's emphasis was to produce a technically acceptable product while keeping costs as low as possible. He also said that the entire corporation, nationally and internationally, was excited about this opportunity to demonstrate that HBI could produce the quality product required at a much lower price than the competitors.

The team queried Mr. Endo and Mr. Terry about several aspects of the project including drilling and jetting procedures, physical aspects of the guar slurry, waste handling procedures, past experience with hazardous substances, and the equipment they anticipate mobilizing to the site. The team indicated that waste should be containerized in roll-off containers as opposed to in pits. The team discussed site security and MLGW power line safety requirements.

Mr. Spann asked if HBI had enough information about the hydrogeological formation at the Depot or would they construct a test column. Mr. Endo said that based on standard practice for jet grouting and the scope of work, HBI would install a test column as the first step in the field trial. Mr. Ballard said that it seemed logical that during injection of the guar slurry some would mix with the formation outside the bounds of the geometry, and he asked if the guar would break down so that it would not clog the formation. Mr. Endo reported that the guar would break down.

Mr. Terry described several aspects of the confirmatory procedures that included sampling the drilling fluid and the return sediment, confirmation soil borings through the PRB wall with samples to ensure the ZVI/sand mixture in the ground was the same as it was prior to filling the geometry, monthly groundwater sampling for six months, testing for down-hole conductivity, and evaluation of the potentiometric surface.

Mr. Miller suggested that HBI install a monitoring well in one of the confirmation soil borings to allow groundwater monitoring inside the wall, and Mr. Ballard agreed it was a good idea.

Mr. Nelson reported that the work plan was on schedule for delivery to the BCT on 3 February 2006. Mr. Ballard requested that CH2M Hill send the work plan to Dr. Ludwig. Field work was on schedule to begin the week of 17 April 2006.

Mr. Ballard asked at what point during the six-month confirmatory sampling period would CH2M Hill decide that HBI's process was not working and bring GeoSierra on board to work on the RD. Mr. Nelson said that CH2M Hill should know within 30-60 days of constructing the pilot PRB whether HBI's process was successful. Mr. Nelson said that groundwater samples would be collected two weeks after construction and that even though contamination would not have had time to reach the sampling point it would provide good information. The next samples would be collected 30 days after construction and should indicate if the PRB was working. The 60% design was due in June, but it would not include the PRB construction method. Mr. Nelson was confident that the schedule provided enough lee way to bring on GeoSierra in order for them to complete the construction portion of the Off-Depot RD if necessary.

Mr. Nelson requested that anyone wishing to observe the pilot study contact him prior to arriving in order to ensure compliance with health and safety requirements.

Wabash Avenue Investigation

Ms. Spann reviewed the basis for the investigation (groundwater contamination levels in MW130 up gradient of Dunn Field) as well as the locations of the suspected sources and for the newly installed monitoring wells. He reported that samples had been collected and that the results did not indicate a source for contaminants of concern. He said that TDEC had turned their attention to two other sites and were working to install additional monitoring wells in those areas. TDEC's goal was to identify the source and the primary responsible party (PRP) of the plume migrating onto Dunn Field.

Mr. Spann indicated that TDEC would make any identified PRP implement a remedy to clean up their source. TDEC would not allow them to leave their source untreated and allow the Depot's permeable reactive barrier to treat it. He reported that EPA had changed contractors and that he was awaiting word on when the investigation could continue.

Dunn Field Groundwater Interim Remedial Action (IRA)

Mr. Holmes reported that the first step to optimize the IRA, as outlined in the Optimization Memo, was to contact the City because the discharge system would exceed the permitted concentration limits for some compounds. He said that the total mass removed would remain about the same, but that the total volume of discharge would decrease. The wastewater treatment plant point of contact, Mr. Akil al Chokachi, was not interested in discussing any changes to the permit limits because the Depot was a high profile location. Mr. Holmes asked Mr. Spann for future assistance in discussing the matter with Mr. Chokachi.

Dunn Field Disposal Sites Remedial Action (RA)

Mr. Price reported that responses to BCT comments on the Rev. 0 RA Work Plan (RAWP) Addendum had been approved. He had received no comments on the Health and Safety Plan. The Rev. 1 RAWP was scheduled to be distributed next week. He reported that the Letter of Intent to dispose of the hazardous waste material at the Bennett treatment facility in Canada was submitted to EPA and was awaiting approval. Bennett was scheduled to submit the waste analysis to the Canadian Ministry on 19 January 2006. Bennett expected Ministry approval by 3 February 2006. Mr. Price said that upon receipt of approval from the EPA and the Canadian Ministry, MACTEC would mobilize to complete the RA. He anticipated mobilizing 6 February 2006, depending upon the weather.

Main Installation Long Term Monitoring (LTM)

Mr. Holmes reported that MACTEC submitted the MI LTM Annual Report for 2005 to the BCT on 13 December 2005. Mr. Holmes said he received and was reviewing comments from EPA. He then discussed EPA's comments regarding the following three additional well locations, two of which the team had previously discussed: one in the southern portion of Treatment Area 1 west of MW97; one down gradient of Screening Site 37; and one in south central portion of the MI for potentiometric surface information. Another EPA comment suggested that LTM sampling be postponed until after the EBT injections began.

Community Involvement Activities

Mr. Holmes reported that risk communication training for the team was scheduled for 15 February 2006. Mr. Price reported that MACTEC had a new project team member, Ms. Sallie Spangenberg, to assist with community relations activities.

Schedule Review February – April

Mr. Holmes distributed and reviewed the deliverables matrix that identified documents and field activities forthcoming in the next three months. The team discussed the need for, or alternatives to, the preparing the 60% Source Areas RD document. The schedule called for an on-board review of the 60% RD. Mr. Ballard suggested that CH2M Hill send the 60% RD slated for internal review to him as well. He would forward it to his reviewers in Cincinnati thereby having time to receive their comments in time for the on-board review.

Next Meeting

The BCT scheduled the next meeting for 16 February 2006 at the MACTEC office in Kennesaw, GA. Mr. Holmes will confirm the date and time for the project team meeting.

Mr. Holmes suggested that the agenda for the February meeting include a review of BCT comments on the ZVI PRB Treatability Study Work Plan. He requested that the team forward any other agenda items to him as soon as possible.

<u>SIGNED</u>	<u>2/16/2006</u>
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MICHAEL DOBBS

DATE

Defense Distribution Center

BRAC Environmental Coordinator

BRAC Cleanup Team Member

<u>SIGNED</u>	<u>2/16/2006</u>
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TURPIN BALLARD

DATE

Environmental Protection Agency

Federal Facilities Branch

Remedial Project Manager

BRAC Cleanup Team Member

<u>SIGNED</u>	<u>2/16/2006</u>
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EVAN SPANN

DATE

Tennessee Department of Environment and Conservation

Memphis Field Office

Division of Superfund

BRAC Cleanup Team Member